

JAMES E. GIBBONS (pro hac vice)  
Cal. State Bar No. 130631  
MANNING & KASS  
ELLROD, RAMIREZ, TRESTER LLP  
801 South Figueroa Street, 15th Floor  
Los Angeles, CA 90017  
Tel. (213) 624-6900  
jeg@manningllp.com

ROBERT W. COHEN (pro hac vice)  
Cal. State Bar No. 150310  
MARIKO TAENAKA (pro hac vice)  
Cal. State Bar No. 273895  
LAW OFFICES OF ROBERT W. COHEN, A.P.C.  
1901 Avenue of the Stars, Suite 1900  
Los Angeles, CA 90067  
Tel. (310) 282-7586  
rwc@robertwcohenlaw.com  
mt@robertwcohenlaw.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

SHIGE TAKIGUCHI, et. al, Individually and  
On Behalf of All Others Similarity Situated,

Plaintiffs,

v.

MRI INTERNATIONAL, INC., EDWIN J.  
FUJINAGA, JUNZO SUZUKI, PAUL  
MUSASHI SUZUKI, LVT, INC., dba  
STERLING ESCROW, and DOES 1-500,

Defendants.

Case No.: 2:13-cv-01183-HDM-NJK

**STIPULATION AND ORDER RE  
LIQUIDATION OF LIFE INSURANCE  
POLICIES AND PAYMENT OF  
FUNDS PURSUANT TO FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

1 WHEREAS, plaintiffs Shige Takiguchi, et al. (“Plaintiffs”) and (1) Junzo Suzuki, (2)  
2 Paul Suzuki, (3) Keiko Suzuki, (4) the Suzuki Enterprises, Inc. Profit Sharing Plan, (5) Catherine  
3 Suzuki, trustee of the Junzo Suzuki Irrevocable Trust, (6) Catherine Suzuki, trustee of the Keiko  
4 Suzuki Irrevocable Trust, (7) Catherine Suzuki, trustee of the Junzo Suzuki and Keiko Suzuki  
5 Irrevocable Trust, (8) Suzuki Enterprises, Inc., (9) Puuikena Investments LLP, (10) Catherine  
6 Mai Suzuki, trustee of the Catherine Suzuki Irrevocable Trust dated May 10, 2013, and (11) Paul  
7 Musashi Suzuki, trustee of the Paul Musashi Suzuki Irrevocable Trust dated May 10, 2013  
8 (collectively, the “Suzuki Defendants”) are collectively referred to herein as the “Parties”;

9 WHEREAS, on December 11, 2017 the Suzuki Defendants entered into a Settlement  
10 Agreement with Plaintiffs by which they agreed to surrender and liquidate certain life insurance  
11 policies and pay the surrender value to Plaintiffs as consideration for resolution this action;

12 WHEREAS, on May 22, 2018 the Court granted final approval of the class action  
13 settlement with the Suzuki Defendants (Dkt. 840);

14 WHEREAS, pursuant to the Settlement Agreement, the following life insurance policies  
15 shall be surrendered by the Suzuki Defendant and liquidated, with the entire surrender proceeds  
16 wire transferred to the Court appointed claims administrator, Heffler Claims Group to be held in  
17 a qualified settlement fund:

- 18 1. Pacific Guardian Life Policy No. 0007225184 owned by Keiko Suzuki;
- 19 2. New York Life Policy No. 46-908-188 owned by Suzuki Enterprises, Inc.; and
- 20 3. New York Life Policy No. 38-164-436 owned by Junzo Suzuki.

21 WHEREAS, as of June 22, 2018, this Court’s preliminary injunction order (Dkt. 183)  
22 freezing the assets of the Suzuki Defendants is permanently lifted and vacated;

23 NOW, therefore, the Parties stipulate as follows:

- 24 1. Pacific Guardian Life is ordered to process the surrender of Policy No. 0007225184  
25 owned by Keiko Suzuki, and transfer the entire surrender value of Policy No.  
26 0007225184 to the qualified settlement account designated by Heffler Claims Group;

- 1 2. New York Life is ordered to process the surrender of Policy No. 46-908-188 owned  
2 by Suzuki Enterprises, Inc. and transfer the entire surrender value of Policy No. 46-  
3 908-188 to the qualified settlement account designated by Heffler Claims Group;  
4 3. New York Life is ordered to process the surrender of Policy No. 46-908-188 owned  
5 by Suzuki Enterprises, Inc. and transfer the entire surrender value of Policy No. 46-  
6 908-188 to the qualified settlement account designated by Heffler Claims Group; and  
7 4. The Suzuki Defendants are ordered to reasonably cooperate with Plaintiffs and the  
8 life insurance policy issuers as necessary in effectuating the surrender of the above  
9 policies.  
10

11 Dated: June 22, 2018

MANNING & KASS  
ELLROD, RAMIREZ, TRESTER LLP

13 By: /s/ James Gibbons  
14 JAMES E. GIBBONS  
15 STEVEN J. RENICK  
Attorneys for Plaintiffs

16 PAUL HASTINGS LLP

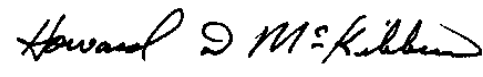
LAW OFFICES OF ROBERT W. COHEN  
A Professional Corporation

18 By: /s/ Nicolas Morgan  
19 NICOLAS MORGAN  
20 Attorneys for Defendant the Suzuki  
21 Defendants

By: /s/ Robert W. Cohen  
ROBERT W. COHEN  
22 MARIKO TAENAKA  
23 Attorneys for Plaintiffs

24 PURSUANT TO STIPULATION, IT IS SO ORDERED.  
25

26 DATED: June 22, 2018

  
United States District Judge